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Attorneys for Plaintiff
COVINGTON SPECIALTY INSURANCE COMPANY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COVINGTON SPECIALTY
INSURANCE COMPANY, a New
Hampshire Corporation,,

Plaintiff,

vs.

FREAKLING BROS. INC., a Nevada
Corporation; GRAND FLAMINGO
CAPITAL MANAGEMENT, LLC., a
Nevada Limited Liability Company; JA
KENNEDY REAL ESTATE
COMPANY, a Nevada Corporation,;

Defendant.

Case No. 2:23-cv-00968-APG-VCF

**STIPULATION TO EXTEND
TIME TO RESPOND TO
AMENDED COMPLAINT**

FIRST REQUEST

Plaintiff Covington Specialty Insurance Company (“Covington”) and Defendants Freakling Bros. Inc., (“Freakling”) and JA Kennedy Real Estate Company, (“JA Kennedy”) by and through their undersigned counsel, all hereby stipulate and agree, in accordance with LR IA 6-1 that all Defendants may have an extension of time through September 1, 2023, to respond to Plaintiff’s Amended Complaint. This is an extension of 15 days for Freakling and 18 days for JA Kennedy. The reason for the extension is to allow Defendants’ counsel sufficient time to become familiar with this matter.

1 Dated this 11 day of August, 2023

2 It is so stipulated:

3 MUSIC PEELER & GARRETT LLP

WRIGHT, FINLAY & ZAK

4 /s/ Nancy J.W. Brown

/s/ Darren T. Brenner

5 Nancy J.W. Brown, Esq. (No. 4484)
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8 *Attorneys for Plaintiff*
9 *Covington Specialty Insurance Company*

Attorneys for Defendant
Freakling Bros, Inc.

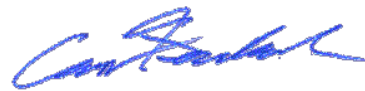
10 GARMAN | TURNER | GORDON

11 s/Eric R Olsen

12 Eric R. Olsen, Esq. (No. 3127)
13 7251 Amigo Street, Suite 210
14 Las Vegas, NV 89119

15 *Attorneys for Defendant*
16 *JA Kennedy Real Estate Inc.*

17 **IT IS SO ORDERED.**

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20 CAM FERENBACH
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 8-14-2023
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

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11 COVINGTON SPECIALTY
12 INSURANCE COMPANY, a New
13 Hampshire Corporation,,

14 Plaintiff,

15 vs.

16 FREAKLING BROS. INC., a Nevada
17 Corporation; GRAND FLAMINGO
18 CAPITAL MANAGEMENT, LLC., a
Nevada Limited Liability Company; JA
KENNEDY REAL ESTATE
COMPANY, a Nevada Corporation,;

19 Defendant.

Case No. 2:23-cv-00968-APG-VCF

PROOF OF SERVICE

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is One Wilshire Building, 624 South Grand Avenue, Suite 2000, Los Angeles, CA 90017-3383.

On August 11, 2023, I served true copies of the following document(s) described as **STIPULATION TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Musick, Peeler & Garrett LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on August 11, 2023, at Los Angeles, California.

/s/ Eric S. Sams
Eric S. Sams

SERVICE LIST

Covington Specialty Insurance Company v. Freakling Bros. Inc.
United States District Court Case No.: 2:23-cv-00968-APG-VCF

VIA U.S. MAIL

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Estate Inc.

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